REMARKS/ARGUMENTS

The rejections presented in the Office Action dated May 21, 2007 (hereinafter Office Action) have been considered. Claims 1-4, 6-9, 11-20, 24-26 and 29-46 remain pending in the application. Reconsideration of the pending claims and allowance of the application in view of the present response is respectfully requested.

OBJECTIONS TO THE ABSTRACT

The Abstract is objected to because, according to the Office Action, "the abstract should not include references to the drawings." Applicants present this response with an amendment to the Abstract to address this rejection. Withdrawal of the objection is therefore respectfully solicited.

REJECTIONS BASED ON 35 U.S.C. § 112

The Examiner has rejected Claims 1-4, 6-9, 11-20, 24-26, 29-34 and 39-46 based on 35 U.S.C. §112, second paragraph, as being indefinite. While not acquiescing with the assertions in paragraphs 8-10 of the Office Action regarding the indefiniteness of these claims, Applicants have amended Claims 1, 11, 12, 19, and 39 to describe a connection being established between an application and selected network service. Withdrawal of the rejection is therefore respectfully solicited.

REJECTIONS BASED ON 35 U.S.C. § 102

Claims 1-4, 7-9, 12, 13, 15, 16, 18-20, 25, 25, 26, 31-34, 39, 40, 43 and 46 are rejected based on 35 U.S.C. §102(e) as being anticipated by U.S. Patent No. 7,080,138 to Baker et al. (hereinafter "*Baker*"). Applicants respectfully traverse the rejection and submit that the claims as originally filed are not anticipated by *Baker*. However, in order to facilitate prosecution of the application and in a bona fide attempt to advance the

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application to allowance, the Applicants present this response with amendment to clarify particular aspects of the claimed invention.

Particular claims have been amended to indicate that service parameters describing application interfaces of selected web services are determined via a web services registry. For example, Claim 1 sets forth that a plurality of interface modules are provided, each capable of establishing communications with one or more of a plurality of web services. Service parameters that describe application interfaces of the plurality of web services are determined via a web services registry. The service parameters associated with the plurality of network services are compared to service related parameters of a service request in order to automatically select a compatible network service. The amendments are fully supported in the Specification as filed (e.g., Specification, p. 18, lines 8-20). Similar changes have been made to independent Claims 12, 19, 35, and 39. Applicants respectfully submit that *Baker* is at least silent on an automatic selection of a web service based on service parameters obtained via a web services registry, and therefore fails to anticipate Claims 1, 12, 19, and 39.

Applicants claims are directed to selecting one of a plurality of web services based on compatibility between a request parameter and a parameter that describes application interfaces of the services. In contrast, *Baker* is directed to "methods and systems for selecting a best server from a group of servers that can provide similar content to a client." (col. 4, lines 39-41). The servers of *Baker* are mirror sites that all host some identical set of content. (*Baker*, col. 1, lines 14-20 and col. 5, lines 27-30). *Baker* describes selecting, via a DNS server, a mirror site based on "a route that has the best available combination of latency, bandwidth and reliability." (col. 1, lines 21-25). As such, *Baker* is at least deficient in describing selecting the best web service from a plurality of web services that may offer different types of services, as reflected in applications interfaces of the web services.

Baker also silent regarding a service request that contains a service related parameter used to select the most compatible service. *Baker* only describes a DNS request being sent from a client to obtain the address of a content server (*Baker*, col. 4, lines 47-53). As is

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well known in the art, a DNS request of this type is a request for an IP address based on a domain name, and the domain name could not be reasonably construed as a "service related parameter." Hostnames and IP addresses are network layer identifiers that facilitate end-to-end packet transmissions, and are independent of any services that may be provided by the network endpoints.

Further, assuming *arguendo* that the domain name contained in a DNS request could be construed as a "service related parameter," *Baker* still could not be reasonable interpreted as showing, for example, "selecting the network service whose service parameters provide the greatest compatibility with the one or more service related parameters." As stated in *Baker*, all of the mirror sites provide the same content (e.g., *Baker* col. 5, lines 27-30), therefore **any** of the mirror site addresses is equally compatible with the request. *Baker* describes no parameter contained in the DNS requests that the DNS server could use determine which mirror provides the greatest compatibility. *Baker* describes choosing "a route that has the best available combination of latency, bandwidth and reliability," but this is at most an implied condition of improved performance, and is insufficient to expressly or inherently show a service request including one or more service related parameters used to determined a service with the greatest compatibility.

Finally, Applicants submit that, because *Baker* is unrelated to selecting "web services" as the term is known in the art, *Baker* does not show an interface to a plurality of web services, nor does *Baker* show determining service parameters that describe application interfaces of the web services via a web services registry. *Baker* only describes a DNS server that provides an address lookup using a domain name, and is silent on a registry having service parameters that describe application interfaces. For at least these reasons, Applicants respectfully submit that *Baker* fails to anticipate at least independent Claims 1, 12, 19, and 39.

Dependent Claims 3-4 and 7-9 depend from independent Claim 1; dependent Claims 13, 15, 16, and 18 depend from independent Claim 12; dependent Claims 20, 25, 26, 31-34, depend from independent Claim 19; and dependent Claims 40, 43, and 46 depend from independent Claim 39. These dependent claims also stand rejected under 35 U.S.C. §102(e)

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as being anticipated by *Baker*. While Applicant does not acquiesce with the particular rejections to these dependent claims, including any assertions concerning inherency or the taking of Official Notice, these rejections are now moot in view of the remarks made in connection with independent Claims 1, 12, 19, and 39. These dependent claims include all of the limitations of the base claim and any intervening claims, and recite additional features which further distinguish these claims from *Baker*. Therefore, dependent Claims 3-4, 7-9, 13, 15, 16, 18, 20, 25, 26, 31-34, 40, 43, and 46 are also allowable over *Baker*.

REJECTIONS BASED ON 35 U.S.C. § 103

Claims 6, 11, 14, 17, 24, 29, 30, 35-38, 41, 42, 44 and 45 are rejected based on 35 U.S.C. §103(a) as being unpatentable over *Baker* in view of U.S. Publication No. 2002/0040390 by Sullivan et al. (hereinafter "*Sullivan*"). Applicants respectfully traverse the rejections. In order to render a claim obvious, the combination of references must at least teach or suggest all of the limitations, and the Applicants respectfully submit that the combination of *Baker* and *Sullivan* fails to meet this standard.

Sullivan describes a "network system that identifies a home network of a user by a network identification in an access request." (*Sullivan*, Abstract). *Sullivan* deals with identification of a network in order to determine "whether an accessing user is a subscriber or a non-subscriber of that network, and if a non-subscriber, whether the accessing user can be connected to the desired home network." *Sullivan* describes the domain name as being used as a network identifier, but states that "any combination of the information used to establish a data communication session with the home network potentially may be used as a network identification." (*Sullivan*, 0022). However, this falls short of describing a service request including service parameters having a business agreement portion that identifies service components having a current business agreement with an application, such that the service component can be automatically selected by a logical access point.

Sullivan describes examining a generic network request to see if the request will be allowed by an intermediary. *Sullivan* does not describe such requests any business agreement portion that describes a component that has a business agreement with an

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application. Instead, *Sullivan* describes using data such as domain name or subscriber's name to determine whether a connection request should be granted. This data does not explicitly describe a business agreement, but is data that is being used for another purpose (e.g., to connect to a home network) from which a business agreement is being inferred. Further, this data is not used for selection of one of a plurality of service components, but is used to establish a connection when the destination service is already known. *Sullivan* does not describe any selection from a plurality of services, but merely the acceptance or denial of a connection request to initiate a pre-selected service.

Further, *Sullivan* fails to cure the deficiencies of *Baker* regarding a web services registry that facilitates determining service parameters that describe application interfaces of the plurality of service components. *Sullivan* describes an identification resolution device 270 that determines whether to allow a connection request, but does not describe that this or any other component provides service parameters that describe application interfaces of a plurality of service components. *Sullivan*, like *Baker*, is focused on IP connectivity, and neither reference teaches or suggests any web services registry that can provide data describing application interfaces. Therefore the combination of *Baker* and *Sullivan* at least fails to teach or suggest all the limitations of independent Claim 35, as originally filed and particularly as amended, and thus fails to render Claim 35 obvious. Because Claims 36-38 depend from Claim 35, these claims are also patentable over the combination of *Baker* and *Sullivan*.

Claims 6, 11, 14, 17, 24, 29, 30, 41, 42, 44 and 45 depend respectively from independent Claims1, 12, 19, and 39, and were rejected as obvious in view of a combination of *Baker* and *Sullivan*. The rejections of Claims 6, 11, 14, 17, 24, 29, 30, 41, 42, 44 and 45 do not rely on *Sullivan* cure the deficiencies of *Baker* as it pertains to independent Claims 1, 12, 19, and 39, nor does *Sullivan* provide such a remedy. A combination of *Baker* and *Sullivan* fails to teach or suggest the invention set forth in Claims 1, 12, 19, and 39, as there is no reference to at least a service request that contains a service related parameter and selecting the network service whose service parameters provide the greatest compatibility with the one or more service related parameters. Nor does such a

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combination teach or suggest a web services registry that facilitates determining service parameters that describe application interfaces of the plurality of service components. While other requisites of establishing *prima facie* obviousness may also be absent, the Applicants respectfully submit that the cited combination of references at least fails to teach or suggest all of the claim limitations. For at least this reason, Claims 6, 11, 14, 17, 24, 29, 30, 41, 42, 44 and 45 are not rendered obvious by the combination of *Baker* and *Sullivan*, and withdrawal of the rejection is respectfully solicited.
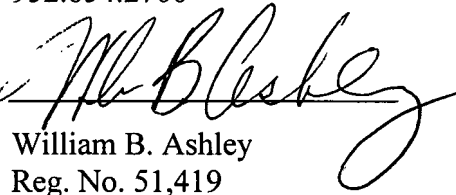
Authorization is given to charge Deposit Account No. 50-3581 (NOKM.018PA) any necessary fees for this filing. If the Examiner believes it necessary or helpful, the undersigned attorney of record invites the Examiner to contact the undersigned attorney to discuss any issues related to this case.

Respectfully submitted,

HOLLINGSWORTH & FUNK, LLC
8009 34th Avenue South, Suite 125
Minneapolis, MN 55425
952.854.2700

Date: 23 July 2007   By:

William B. Ashley
Reg. No. 51,419

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